

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007



ISO 9001: 2008

ISO 14001: 2004

October 12, 2010
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

John Peterka
President
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



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MACT EXCESSIVE EXCEEDANCE REPORT

Heritage-WTI, Inc

October 12, 2010

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	8/21/2010 11:14:24 PM	8/22/2010 12:05:24 AM	Operator Error -Feed Mix	Poor feed mix caused THC spike.	Restart unit. Revise feed mix.	0	51	0
2	RJ DP	8/22/2010 12:15:24 AM	8/22/2010 12:22:23 AM	Operator Error - Poor Operation	Operator failed to adjust to pressure drop.	Re-established OPL. Restarted unit.	0	6	59
3	THC	9/13/2010 2:27:21 AM	9/13/2010 3:26:22 AM	Operator Error - Poor Operation	operator failed to add enough combustion air.	Increased air flow. Restarted unit.	0	59	1
4	THC	9/22/2010 5:55:26 AM	9/22/2010 7:02:23 AM	Operator Error - Feed Prep	Heavy drum feed caused THC spike.	Charge size reduced. Unit restarted.	1	6	57
5	THC	9/22/2010 11:12:25 AM	9/22/2010 12:12:22 PM	Operator Error - Feed Prep	Heavy drum feed caused THC spike.	Charge size reduced. Unit restarted.	0	59	57
6	Kiln Temperature	9/22/2010 11:36:27 AM	9/22/2010 11:46:26 AM	Operator Error- Poor Operation	Operator failed to maintain temperature.	Regained temp. Restarted unit.	0	9	59
7	THC	9/23/2010 10:15:23 PM	9/23/2010 11:15:23 PM	Operator Error - Feed Mix	Poor feed mix lead to THC exceedance.	Altered feed mix. Restarted unit.	1	0	0
8	THC	9/28/2010 7:30:24 AM	9/28/2010 8:28:22 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	57	58
9	THC	9/29/2010 9:11:29 AM	9/29/2010 9:14:29 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	3	0
10	THC	10/11/2010 1:58:22 AM	10/11/2010 2:00:22 AM	Operator Error - Feed Prep	Feed prep error caused poor combustion and THC.	Reduced charge size. Restarted unit.	0	2	0

** End of report **

bcc: Env. Dept
Frank Murray
Bob Buchheit
Kevin Lloyd

file name: environ/MACT/HWC MACT/exceedances/eer10_1012